

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

	§	
United States of America,	§	
<i>Plaintiff,</i>	§	Civil Case
vs.	§	(CDCS: 2017A40449)
	§	(CDCS: 2017A40460)
I & S Healthcare Services LLC,	§	(CDCS: 2017A40495)
<i>Defendant.</i>	§	(CDCS: 2017A40507)
	§	(CDCS: 2017A40466)
	§	(CDCS: 2017A40476)
	§	
	§	

Complaint

1. Jurisdiction

The District Court has jurisdiction because a federal agency is a party to this action and under the express authority granted to it by the United States Constitution Article III, Section 2, 28 U.S.C. § 1345 (2013).

2. Venue

Venue is proper in the Southern District of Texas, Houston Division, because the defendant resides in Houston and may be served at 2646 South Loop West, Ste 370, Houston, Texas 77054. The defendant's process address is located in Harris County. 28 U.S.C. § 1391 (2013).

### 3. Breach of Contract

#### a. Defaulted Note

This action seeks recovery of a debt owed to the United States. The defendant has not repaid the debt as agreed.

The amount owed includes:

#### CDCS 2017A40449

Principal	\$ 477.91
Interest as of 02/16/2017.	\$ 248.60
Attorney's fees	<u>\$ 550.00</u>
Balance due	\$1276.51

Interest rate of 10.870% accrued at a daily rate of \$ 0.

#### CDCS 2017A40460

Principal	\$ 1,999.09
Interest as of 02/16/2017.	\$ 1,023.25

Balance due	<u>\$ 3,022.34</u>
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Interest rate of 10.87% accrued at a daily rate of \$ 0.

CDCS 2017A40495

Principal	\$ 2,235.98
Interest as of 02/16/2017.	<u>\$ 1,115.70</u>
Balance due	\$ 3,351.68

Interest rate of 11.0% accrued at a daily rate of \$ 0.

CDCS 2017A40507

Principal	\$ 2,351.61
Interest as of 02/16/2017.	<u>\$ 1,163.47</u>
Balance due	\$ 3,515.08

Interest rate of 11.0% accrued at a daily rate of \$ 0.

CDCS 2017A40466

Principal	\$ 6,756.80
Interest as of 02/16/2017.	<u>\$ 3,388.02</u>
Balance due	\$ 10,144.82

Interest rate of 10.870% accrued at a daily rate of \$ 0.

CDCS

Principal	<b>\$6,859.30</b>
Interest as of 02/16/2017.	<u>\$3,410.82</u>
Balance due	\$10,270.12

Interest rate of 10.870% accrued at a daily rate of \$ 0.

The certificates of indebtedness, shows the total owed excluding attorney's fees and central intake facility charges. On the date of the certificate the principal and interest shown were correct after credits having been applied.

b. Failure to Pay

Demand for payment has been made by plaintiff.  
Defendant has failed to pay the debt.

4. Prayer

The United States prays for the sums of the Balance due in paragraph 3 to include principal, interest, and attorney fees. Plaintiff prays for prejudgment interest through the date of judgment and other fees that the Court deems proper.

Respectfully submitted,

/s/ Clifton C. Kyle

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Kyle Law Group, P.C.  
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1716A Washington Ave

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Houston, Texas 77007

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U.S. DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, D.C. 20227

ACTING ON BEHALF OF  
Department of Health & Human Services,  
Centers for Medicare & Medicaid Services,  
Medicare Overpayment  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and Address(es):

I & S Healthcare Services, LLC

The debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 477.91
Interest through 2/16/17:	\$ 248.60

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 2/16/17: \$ 726.51**

NOTE: Per the creditor agency, interest continues to accrue on the principal amount shown here at the rate of 10.87% annually (a rate of \$0.14 per diem).

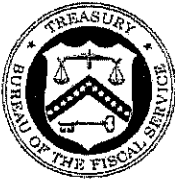
**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the Department of Health & Human Services, Centers for Medicare & Medicaid Services, Medicare Overpayment.

X *Ashleigh Edmonds*

February 16, 2017

Signed by: Ashleigh N. Edmonds

Ashleigh Edmonds  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



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The debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$1,999.09
Interest through 2/16/17:	\$1,023.25

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 2/16/17:      \$3,022.34**

NOTE: Per the creditor agency, interest continues to accrue on the principal amount shown here at the rate of 10.87% annually (a rate of \$0.59 per diem).

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the Department of Health & Human Services, Centers for Medicare & Medicaid Services, Medicare Overpayment.

X *Ashleigh Edmonds*

February 16, 2017

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I & S Healthcare Services, LLC

The debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 2,235.98
Interest through 2/16/17:	\$ 1,115.70

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 2/16/17: \$ 3,351.68**

NOTE: Per the creditor agency, interest continues to accrue on the principal amount shown here at the rate of 11.0% annually (a rate of \$0.67 per diem).

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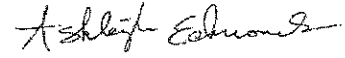
Principal:	\$ 2,351.61
Interest through 2/16/17:	\$ 1,163.47

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 2/16/17: \$ 3,515.08**

NOTE: Per the creditor agency, interest continues to accrue on the principal amount shown here at the rate of 11.0% annually (a rate of \$0.71 per diem).

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the Department of Health & Human Services, Centers for Medicare & Medicaid Services, Medicare Overpayment.

X 

February 16, 2017

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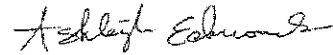
Principal:	\$ 6,756.80
Interest through 2/16/17:	\$ 3,388.02

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 2/16/17: \$10,144.82**

NOTE: Per the creditor agency, interest continues to accrue on the principal amount shown here at the rate of 10.87% annually (a rate of \$2.01 per diem).

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the Department of Health & Human Services, Centers for Medicare & Medicaid Services, Medicare Overpayment.

X 

February 16, 2017

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I & S Healthcare Services, LLC

The debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 6,859.30
Interest through 2/16/17:	\$ 3,410.82

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 2/16/17:      \$10,270.12**

NOTE: Per the creditor agency, interest continues to accrue on the principal amount shown here at the rate of 10.87% annually (a rate of \$2.04 per diem).

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the Department of Health & Human Services, Centers for Medicare & Medicaid Services, Medicare Overpayment.

X A handwritten signature in black ink, appearing to read "Ashleigh N. Edmonds".

February 16, 2017

Signed by: Ashleigh N. Edmonds

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Financial Program Specialist  
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